

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
5:19-cv-00467-BO

JUSTIN J. WHITE,

Plaintiff,

v.

VANCE COUNTY, NORTH CAROLINA,  
VANCE COUNTY SHERIFF'S OFFICE,  
PETER WHITE, in his official and individual  
capacities, LAWRENCE D. BULLOCK, in  
his official and individual capacities,  
WELDON WALLACE BULLOCK, in his  
official and individual capacities, and  
WESTERN SURETY COMPANY, a division  
of CNA Surety Company,

Defendants.

**DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

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NOW COME the defendants, by and through counsel, and, pursuant to Rule 56 of the Federal Rules of Civil Procedure, move for summary judgment in their favor on the plaintiff's claims, for the reasons set forth in their supporting Memorandum of Law, which is filed contemporaneously with this motion. The defendants submit that no genuine material fact exists as to the plaintiff's claims and, additionally, the individual defendants are entitled to qualified immunity, sovereign/governmental immunity, and public officer's immunity as set out in the Memorandum of Law. In addition, defendant Western Surety is entitled to summary judgment on the plaintiff's claims on the bond.

Respectfully submitted, this 30<sup>th</sup> day of March, 2021.

/s/ Christopher J. Geis

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is an attorney at law licensed to practice in the State of North Carolina, is attorney for defendants in this matter, and is a person of such age and discretion as to be competent to serve process.

I hereby certify that, on March 30, 2021, I electronically filed the foregoing **DEFENDANTS' MOTION FOR SUMMARY JUDGMENT** with the Clerk of the Court using the CM/ECF system, which will send notification of such to the following CM/ECF participant:

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